

EXHIBIT B

Home Page Draft

If you are an individual or entity who consumed, and/or paid any amount of money for, generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ a class action lawsuit could affect your rights.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-SAK

HOME	SEARCH ELIGIBILITY	INTERACTIVE MAP AND REMEDIES	REGISTER FOR INFORMATION	FREQUENTLY ASKED QUESTIONS	IMPORTANT DOCUMENTS	CONTACT US
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A federal court authorized this Notice. You are not being sued.

This is not a solicitation from a lawyer.

- The purpose of this notice is to alert you about class action lawsuits (collectively referenced herein as the “Lawsuit”) brought by individuals and entities who consumed and/or purchased Valsartan or Valsartan Containing Drugs that were manufactured, produced, or sold by the Defendants. The Lawsuit asserts the Defendants violated numerous state laws by manufacturing, producing and/or selling Valsartan or VCDs that were contaminated with probable genotoxic human carcinogens in the form of nitrosamines, N-nitrosodimethylamine (“NDMA”) and N-nitrosodiethylamine (“NDEA”). Defendants have denied any wrongdoing and asserted various legal defenses. This portion of the Lawsuit only includes class action claims for economic losses and class action claims for future medical monitoring. This does not include personal injury claims, and does not include any claims related to Losartan or Irbesartan.
- The Court has determined that the Lawsuit can proceed as a class action and has certified a number of detailed classes and subclasses by claim, defendant, and groupings of states. Below are summary class definitions authorized by the Court for the express purpose of providing this Notice. This website will help you determine whether or not you are a class member, and if so, for which subclasses.

[SEARCH ELIGIBILITY]

This is a draft layout of the proposed website for illustrative purposes. The final website may substantially change in form and substance depending upon the final requirements dictated by the Court, Parties, Class data, Defendant data and any other specifications determined to be required by the Administrator.

- **Consumer Economic Loss Class:** All individuals and entities in the United States and its territories and possessions who, since at least January 1, 2012, through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Defendant.
 - **Medical Monitoring Class:** Individuals residing in the United States and its territories and possessions (except Mississippi, North Carolina, and North Dakota) who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.
 - **Third Party Payor Class:** All Third Party Payors that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in any of the 50 states, Puerto Rico or the District of Columbia for a valsartan-containing drug that was manufactured, distributed, or sold in the United States by any Active Pharmaceutical Ingredient, Finished Dose, Wholesaler, or Pharmacy Defendant.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
OPT OUT OF THE LAWSUIT	<p>Remove yourself from the Lawsuit. Receive no benefits if the Classes prevail or a settlement is reached but retain the right to sue separately.</p> <p>If you do not want to participate in the economic loss and/or medical monitoring claims in the Lawsuit, you may ask to be excluded in writing by [EXCLUSION DATE] By electing to exclude yourself, or “opt out” of the economic loss and/or medical monitoring claims in the Lawsuit, you will not receive any benefits of any judgment or settlement in the economic loss and/or medical monitoring Lawsuit, nor will you be bound by any decision on the economic loss and/or medical monitoring claims in the Lawsuit that is favorable to Defendants. If you elect to exclude yourself from only the economic loss or medical monitoring classes, you will not be excluded from the remaining classes. You will retain the right to file a separate lawsuit regarding the same legal claims at issue in this Lawsuit, if you exclude yourself as to these claims.</p>	_____, 2023
DO NOTHING	<p>Stay in the Lawsuit to await the outcome. Give up the right to sue separately.</p> <p>If you do nothing, you will automatically be part of the Lawsuit if you qualify as a Class Member. Plaintiffs and their attorneys will act as your representative and counsel, and if they prevail</p>	No Deadline

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SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
	in the Lawsuit or a settlement is reached and you are confirmed as a Class Member, you will be entitled to your proportionate share of any money or other benefits they obtain for the Class(es). If the Defendants prevail on any claims, however, you will be bound by that judgment and will not be able to separately sue the Defendants regarding the claims brought in the Lawsuit.	

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case has not decided in favor of the Plaintiffs or the Defendants.

Are you a direct purchasing consumer or third-party payor of Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ?

Consumer

Third-Party Payor

If Consumer Selected Go to CONSUMER Search Class Eligibility Page

If Third Party Payor is Selected Go to THIRD PARTY PAYOR Answers Section

CONSUMER Search Class Eligibility Page

If you are an individual or entity who consumed, and/or paid any amount of money for, generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ a class action lawsuit could affect your rights.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-SAK

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Please enter the information below, regarding your purchases of Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ, to search your potential eligibility as a Class Member in this lawsuit?

Please enter the following information to search and identify your potential subclass eligibility and receive information regarding your courses of action.

Prescription Drug: (4 options: (1) Generic Valsartan or a Generic Drug That Contained Valsartan (.e.g. Valsartan HCTZ, Amlodipine-Valsartan, Amlodipine Valsartan HCTZ) (2) a Non-Valsartan Blood Pressure Medication) (3) Brand Name Diovan, Diovan HCT, Exforge, Exforge HCT, or Prexxartan; (4) I Don't Know Which I Took.

State or Territory Purchased: (all US States and Territories are listed as an option)

State of Territory Used: (all US States and Territories are listed as an option)

Period of coverage:

Starting date: mm/dd/yyyy (no earlier than 1/1/12)

Ending date: mm/dd/yyyy (no later than 11/10/21)

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(+) Add another prescription drug, location purchased and/or period of coverage

[SEARCH]

Potential Negative Eligibility Results

1. If Prescription Drug option #2 “a Non-Valsartan Blood Pressure Medication,” or #3 “Brand Name”, then Class Eligibility Determination is “You Do Not Qualify and Are Not A Member of any of the Classes or Subclasses (neither consumer economic loss, nor medical monitoring, nor third party payor)Class.”
2. If the only Period of Coverage is before 1/1/12 or after 11/10/21, then Class Eligibility Determination is “You Do Not Qualify and Are Not a Member of any of the Classes or Subclasses (neither consumer economic loss nor medical monitoring).”
3. If #4 is Selected, display the following message: “If you are unsure of what blood pressure medication you took, you may contact your pharmacy to determine which medication(s) you were prescribed, when you were prescribe them, and whether you purchased and/or took the Brand Name or generic versions of the medication. If you contact your pharmacy, please also obtain the NDC codes for those medications at the same time, as you may need those later in the litigation process in order to qualify for any benefits that may be obtained.”

Potential Positive Eligibility Results (Display Results from 1 or 2 or both depending on data entry)

1. **Consumer Economic Loss Class:** All individuals and entities in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Defendant.
The specific subclass(es) to which you belong are:
[STATE BY STATE LIST WILL APPEAR HERE BASED UPON STATES OF PURCHASE ENTERED IN FORM]]

(specific FAQs)

1.a Who is included in the Consumer Economic Loss Class?

The Court has certified a number of detailed subclasses by claim, defendant, and groupings of states. Below is a simplified class definition authorized by the Court for the express purpose of providing this Notice. More detailed information regarding the various classes and subclasses certified may be viewed on the website referenced herein.

The Consumer Economic Loss Class includes: All individuals and entities in the United States and its territories and possessions who, since at least January 1, 2012, through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Defendant.

1.b Can individuals be in both the Consumer Economic and Medical Monitoring Classes?

Yes, if you both paid for and consumed sufficiently high amounts of the drugs at issue in the Lawsuit, you may be entitled both to get an economic recovery (if Plaintiffs prevail) and to obtain certain monitoring-relating benefits (if Plaintiffs prevail). In that case, you would be a member of both the economic loss class and the medical monitoring class.

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1.c Are there exceptions to being a Class Member?

Yes. Excluded from some or all of the Consumer, Medical Monitoring, and Third Party Payor Classes are the following: (a) Defendants and affiliated entities; (b) Defendants' assigns, and successors; (c) All federal and state governmental entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; (d) Pharmacy Benefit Managers ("PBMs"); (e) TPPs whose only valsartan-containing drug purchases, who would otherwise meet this Class Definition, were for Hetero Defendants' valsartan-containing drugs dispensed prior May 1, 2018; and (f) All class members who properly execute and file a timely request for exclusion.

2. **Medical Monitoring Class:** Individuals residing in the United States and its territories and possessions (except Mississippi, North Carolina, and North Dakota) who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

The specific subclass(es) to which you belong are:

[STATE BY STATE LIST WILL APPEAR HERE BASED UPON STATES OF USE ENTERED IN FORM]

(specific FAQs)**2.a What does "Medical Monitoring" mean?**

Medical Monitoring refers to a program or protocol to monitor individuals who are *eligible* to be monitored, and who *choose* to be monitored, for signs of specific diseases or conditions. Think of cholesterol tests, mammograms, X-rays, etc.

Medical Monitoring in *this* context refers to a specific program or fund that would be established (and paid for by Defendants) if Plaintiffs prevail on their claims or the Parties agree to it. It would help identify the cancers that Plaintiffs allege to be associated with exposure to the carcinogens found in the adulterated valsartan-containing drugs. The program may include tests such as physical exams and lab work, but those are just examples. No specific program has been ordered by a Court to be created at this time.

2.b Who is included in the Medical Monitoring Class?**23(b)(3) Medical Monitoring Independent Claim Class:**

All individuals residing in Alaska; Arizona; Arkansas; California; Colorado; Delaware; District of Columbia; Florida; Hawaii; Idaho; Maine; Massachusetts; Minnesota; Montana; New Mexico; Pennsylvania; South Dakota; Utah; West Virginia; and Wyoming and who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

23(b)(2) Medical Monitoring (Physical Injury Required) Remedy Subclass:

All individuals residing in Alabama; Connecticut; Georgia; Illinois; Iowa; Kentucky; Louisiana; Michigan; Nebraska; New Hampshire; Oklahoma; Oregon; and Wisconsin who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

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23(b)(2) Medical Monitoring (Physical Injury Not Required) Remedy Subclass:

All individuals residing in California; District of Columbia; Guam; Indiana; Kansas; Maryland; Missouri; Nevada; New Jersey; New York; Ohio; Puerto Rico and other Federal territories; Rhode Island; South Carolina; Tennessee; Texas; Vermont; Virgin Islands; Virginia; and Washington who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

2.c. What does “Lifetime Cumulative Threshold” mean?

Lifetime Cumulative Threshold is the minimum exposure from consumption of valsartan-containing drugs to entitle someone to be monitored (if the other requirements for medical monitoring are satisfied). It is a threshold of exposure that Plaintiffs allege to be associated with a statistically significant increased risk of developing certain cancers. Simply put, it means someone has consumed enough contaminated Valsartan to put them at risk.

Defendants deny that the valsartan-containing drugs increase cancer risk.

The Court has not decided who (and whose expert scientists) are correct.

2.d How do I know if I consumed the “Lifetime Cumulative Threshold”?

Different manufacturers had different levels of alleged carcinogens in their valsartan-containing drugs. And, different people take different dosages of their medicine, and for different time periods. Thus, the determination of whether a Class Member consumed a Lifetime Cumulative Threshold is based on a combination of dosage, who the API (Active Pharmaceutical Ingredient) manufacturer was, and time period of drug consumption. (As discussed more below, if you are unsure of which API manufacturer prepared your medicine, this information may be obtained from your pharmacy.)

There are four main Active Pharmaceutical Ingredient (API) manufacturers who are defendants in this case: Zhejiang Huahai Pharmaceuticals; Hetero Drugs; Mylan N.V.; and Aurobindo Pharma Ltd. The table below shows the different paths to reaching the Lifetime Cumulative Threshold.

Daily Dosage	Duration of Ingestion of Drug	Manufacturer of Contaminated Active Pharmaceutical Ingredient (API)
320 mg	3 months	Zhejiang Huahai API
	18 months	Hetero API
	54 months	Mylan and/or Aurobindo API
160 mg	6 months	Zhejiang Huahai API
	32 months	Hetero API
	108 months (9 years)	Mylan and/or Aurobindo API
80 mg	12 months	Zhejiang Huahai API
	64 months	Hetero API

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	216 months	Mylan and/or Aurobindo API
40 mg	24 months	Zhejiang Huahai API
	128 months	Hetero API
	432 months	Mylan and/or Aurobindo API

Example One: someone who was prescribed 320 mg and who consumed two (2) months of ZHP APO and six (6) months of Hetero API has met the Lifetime Cumulative Threshold. There is no requirement to only have consumed drugs manufactured by one defendant.

Example Two: Someone who was prescribed 40 mg and took the VCDs for a year has *not* met the Lifetime Cumulative Threshold.

2.e How do I know if I have a “Physical Injury”, as mentioned in the “Physical Injury Remedy Subclass”? I thought the Notice said physical injury claims are NOT part of the class?

If you are already suing the Defendants for a cancer that you already have and that you allege to have been caused by your consumption of contaminated Valsartan, you are not in the class, because the class seeks monitoring for potential *future* cancer.

Plaintiffs allege here that the “physical injury” as relevant to medical monitoring is a physical change in the body (on a genetic or subcellular level) caused by ingesting contaminated valsartan. Thus, if you consumed the Lifetime Cumulative Threshold, Plaintiffs allege (and Defendants dispute) you have been injured within the meaning of medical monitoring law.

2.f How do I determine what hypertension/blood pressure medication I was prescribed?

This information can be obtained by request from your pharmacy.

2.g I filled my blood pressure medicine at many different pharmacies, only some or none are listed here. Does that mean I’m not in the class?

You can still be in the class if you filled prescriptions at pharmacies not listed in the notice. The Class Representatives have asserted class claims against multiple levels of the chain of distribution—manufacturers, suppliers, and retail pharmacies. If you purchased contaminated valsartan at a pharmacy that is not a defendant in this case, it is possible the medicine was still manufactured or supplied by another defendant in the case.

2.h Can individuals be in both the economic loss and medical monitoring class?

Yes, please see question XX above.

If you both paid for and consumed sufficiently high amounts of the drugs at issue in the Lawsuit, you may be entitled both to get an economic recovery (if Plaintiffs prevail) and to obtain certain monitoring-relating benefits (if Plaintiffs

2.i I live in a state that appears both as within the “Independent Claim Class” and also one of the “Remedy Subclasses” - which one am I in?

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You can be in both the “Independent Claim Class” and one of the “Remedy Subclasses” if you live in certain states. It does not affect any choice you have at this time.

2.j What happens if I lived in multiple states while taking valsartan?

There is no requirement to have only lived in one state.

2.k Are there exceptions to being a Class Member?

Yes. Excluded from some or all of the Consumer, Medical Monitoring, and Third Party Payor Classes are the following: (a) Defendants and affiliated entities; (b) Defendants’ assigns, and successors; (c) All federal and state governmental entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; (d) Pharmacy Benefit Managers (“PBMs”); (e) TPPs whose only valsartan-containing drug purchases, who would otherwise meet this Class Definition, were for Hetero Defendants’ valsartan-containing drugs dispensed prior May 1, 2018; and (f) All class members who properly execute and file a timely request for exclusion.

2.l Who has access to the information I enter into this website? How will it be protected?

The only persons who will have access to information you enter on this website are attorneys for the Plaintiffs and their support staff (e.g., paralegals) and Angeion Group, LLC, who was retained to provide class notice in this case and maintain this website.

Angeion Group is an experienced provider of class notice and has overseen more than 2,000 class action settlements. Its privacy practices are in compliance with federal and state privacy and data security laws, such as the California Consumer Privacy Act and HIPAA. Angeion Group also engages in additional security measures, such as encryption of communications received and financial institution standard of AES 256-bit encryption of data stored on its servers. It also maintains and regularly updates its data security practices to ensure that information provided by class members—including Personally Identifiable Information (PII) and Personal Health Information (PHI)—is protected.

THIRD PARTY PAYOR PAGE

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation
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HOME	SEARCH ELIGIBILITY	INTERACTIVE MAP AND REMEDIES	REGISTER FOR INFORMATION	FREQUENTLY ASKED QUESTIONS	IMPORTANT DOCUMENTS	CONTACT US
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Third Party Payor Class: All Third Party Payors that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in any of the 50 states, Puerto Rico or the District of Columbia for a valsartan-containing drug that was manufactured, distributed, or sold in the United States by any Active Pharmaceutical Ingredient, Finished Dose, Wholesaler, or Pharmacy Defendant.

(specific FAQs)

3.a Who is included in Third-Party Payor Class?

All Third-Party Payors that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in any of the 50 states, Puerto Rico or the District of Columbia, for a valsartan-containing drug that was manufactured, distributed, or sold in the United States by any Active Pharmaceutical Ingredient, Finished Dose, Wholesaler, or Pharmacy Defendant.

[INSERT DETAILED SUBCLASS DEFINITIONS HERE AND REFER TO CLASS CERTIFICATION ORDER]

3.b Are there exceptions to being a Class Member?

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Yes. Excluded from some or all of the Consumer, Medical Monitoring, and Third Party Payor Classes are the following: (a) Defendants and affiliated entities; (b) Defendants' assigns, and successors; (c) All federal and state governmental entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; (d) Pharmacy Benefit Managers ("PBMs"); (e) TPPs whose only valsartan-containing drug purchases, who would otherwise meet this Class Definition, were for Hetero Defendants' valsartan-containing drugs dispensed prior May 1, 2018; and (f) All class members who properly execute and file a timely request for exclusion.

Interactive Map Page

If you are an individual or entity who consumed, and/or paid any amount of money for, generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ a class action lawsuit could affect your rights.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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Select your geographic location of purchase to see the potential remedies available in that state or territory.



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[BY SELECTED A STATE, WEBSITE WILL PROVIDE SPECIFIC SUBCLASS INFORMATION FOR THAT STATE

FOR ALL 3 TYPES OF CLASSES]

Register For Information Page

**If you are an individual or entity who consumed,
and/or paid any amount of money for, generic
Valsartan, Valsartan HCTZ, Amlodipine Valsartan
or Amlodipine Valsartan HCTZ a class action
lawsuit could affect your rights.**

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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Register To Receive Information And Updates Regarding This Lawsuit

First Name: _____

Last Name: _____

Email Address: _____

On a periodic basis we will email you updates regarding this lawsuit. Please update your email accounts authorized senders to include info@info.com to ensure that these updates are not erroneously routed to your junk or spam folders.

Frequently Asked Questions Page

If you are an individual or entity who consumed, and/or paid any amount of money for, generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ a class action lawsuit could affect your rights.

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BASIC INFORMATION**1. Why was this Notice issued?**

A federal court authorized this Notice because you have a right to know about this class action Lawsuit and about all of your rights and options. This Notice explains the Lawsuit and your legal rights.

The Honorable Robert B. Kugler of the United States District Court for the District of New Jersey is overseeing the class actions in the Lawsuit as part of a Multi-District Litigation (“MDL”) called *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK-SAK. This part of the MDL pertains only to Valsartan economic loss and medical monitoring claims. The people

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that filed the Lawsuit are called the “Plaintiffs” and the companies they sued are called the “Defendants.” This part of the Lawsuit does not involve Losartan or Irbesartan.

2. What is the Lawsuit about?

The Lawsuit alleges the Defendants violated numerous state laws by manufacturing, producing and/or selling Valsartan or VCDs that were contaminated with probable genotoxic human carcinogens in the form of nitrosamines, N-nitrosodimethylamine (“NDMA”) and N-nitrosodiethylamine (“NDEA”). Defendants deny all allegations of fault, wrongdoing, or liability made in the Lawsuit, and have asserted various legal defenses.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are known as “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “class” or “class members.” One court resolves a class action lawsuit for all class members, except for those who opt out of the litigation. The Plaintiffs and the Defendants are the Parties (the “Parties”) in the Litigation. The names of the individual Plaintiffs are listed on the website and the Defendants for the Consumer Economic Loss Classes, the Medical Monitoring Classes, and Third Party Payor Classes are listed below.

The Consumer Economic Loss Class Defendants

Manufacturer Defendants:

- Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC, Torrent Pharmaceuticals Ltd.; and Torrent Pharma Inc., Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC., Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan Pharmaceuticals, Inc., Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; and, Camber Pharmaceuticals, Inc., Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; and Aurolife Pharma, LLC

Retail Pharmacy Defendants

- Walgreens, CVS, Walmart, Kroger, Rite-Aid, Express Scripts, OptumRx, Albertson’s

Wholesaler Defendants

- Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation

Medical Monitoring Class Defendants

Manufacturer Defendants

- Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC, Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC., Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan, LLC

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Retail Pharmacy Defendants

- Walmart; Rite-Aid

Wholesaler Defendants

- Express Scripts, McKesson Corporation, and/or AmerisourceBergen Corporation

The Third Party Payor Class Defendants**Manufacturer Defendants**

- Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC, Torrent Pharmaceuticals Ltd.; and Torrent Pharma Inc., Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC., Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan Pharmaceuticals, Inc., Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; and, Camber Pharmaceuticals, Inc., Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; and Aurolife Pharma, LLC

Wholesaler Defendants

- Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation

4. Is there money available?

No money or benefits are available now because the Court has not decided the merits of the Plaintiffs' claims, and the Parties have not settled the case. There is no guarantee that money or benefits ever will be obtained. If money or benefits become available either by way of settlement or if the Plaintiffs prevail at trial or through legal motions, Class Members may have to take additional steps, such as submitting a claim form or providing other evidence, in order to determine whether they are eligible to recover any money or benefits. In that event, you will be notified of whatever additional steps you must take.

AM I A CLASS MEMBER?**5A. Who is included in the Consumer Economic Loss Class?**

The Court has certified a number of detailed subclasses by claim, defendant, and groupings of states. Below is a simplified class definition authorized by the Court for the express purpose of providing this Notice. More detailed information regarding the various classes and subclasses certified may be viewed on the website referenced herein.

The Consumer Economic Loss Class includes: All individuals and entities in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Defendant.

5B. Who is included in the Medical Monitoring Class?

The Medical Monitoring Classes are as follows.

23(b)(3) Medical Monitoring Independent Claim Class:

All individuals residing in Alaska; Arizona; Arkansas; California; Colorado; Delaware; District of Columbia; Florida; Hawaii; Idaho; Maine; Massachusetts; Minnesota; Montana; New Mexico; Pennsylvania; South Dakota; Utah; West Virginia; and Wyoming and who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

23(b)(2) Medical Monitoring (Physical Injury Required) Remedy Subclass:

All individuals residing in Alabama; Connecticut; Georgia; Illinois; Iowa; Kentucky; Louisiana; Michigan; Nebraska; New Hampshire; Oklahoma; Oregon; and Wisconsin who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

23(b)(2) Medical Monitoring (Physical Injury Not Required) Remedy Subclass:

All individuals residing in California; District of Columbia; Guam; Indiana; Kansas; Maryland; Missouri; Nevada; New Jersey; New York; Ohio; Puerto Rico and other Federal territories; Rhode Island; South Carolina; Tennessee; Texas; Vermont; Virgin Islands; Virginia; and Washington who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA, NDEA, or other nitrosamine, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012.

6. Can Individuals be in More than One Class?

Yes, you can be a member of more than one class.

If you both paid for and consumed sufficiently high amounts of the drugs at issue in the Lawsuit, you may be entitled both to get an economic recovery (if Plaintiffs prevail) and to obtain certain monitoring-relating benefits (if Plaintiffs prevail). In that case, you would be a member of both the economic loss class and the medical monitoring class.

In addition, with respect to medical monitoring, residents of certain states are members in more than one class.

7. Who is included in the Third Party Payor Class?

All Third-Party Payors that, from at least January 1, 2012, through the date of final recall as of November 10, 2021, paid any amount of money in any of the 50 states, Puerto Rico or the District of Columbia, for a valsartan-containing drug that was manufactured, distributed, or sold in the United States by any Active Pharmaceutical Ingredient, Finished Dose, Wholesaler or Pharmacy Defendant.

8. Are there exceptions to being a Class Member?

Yes. Excluded from some or all of the Consumer, Medical Monitoring, and Third Party Payor Classes are the following: (a) Defendants and affiliated entities; (b) Defendants' assigns, and successors; (c) All federal and state governmental entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; (d) Pharmacy Benefit Managers ("PBMs"); (e) TPPs whose only valsartan-containing drug purchases, who would otherwise meet this Class Definition, were for Hetero Defendants' valsartan-containing drugs dispensed prior May 1, 2018; and (f) All class members who properly execute and file a timely request for exclusion.

YOUR RIGHTS AND OPTIONS

9. How do I opt out of the Lawsuit?

If you want to keep your right, if any, to separately sue the Defendants about the legal issues in this case, you must take steps to exclude yourself from the Lawsuit. This is called "opting out" of the Class(es). The deadline for requesting exclusion from the Lawsuit is **[Exclusion Deadline]**.

To exclude yourself, you must submit a written request for exclusion that includes the following information:

- The name of the Lawsuit: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK-SAK (D.N.J.);
- Your name and current address;
- Your personal signature; and
- A statement clearly indicating your intent to be excluded from the entire Lawsuit, or only the economic loss claims, or only the medical monitoring claims in the Lawsuit.

Your request for exclusion must be mailed to the address below so it is postmarked no later than **[Exclusion Deadline]**.

Valsartan Class Action Administrator
ATTN: Exclusion Request
PO Box 58220
Philadelphia, PA 19102

By electing to be excluded: (1) you will not share in any potential recovery that might be obtained by the Classes as a result of trial, legal motion, or settlement in the Lawsuit; (2) you will not be bound by any decision in the Lawsuit that is either favorable to the Classes or favorable to the Defendants; and (3) you may present any claims you have against the Defendants by filing your own lawsuit.

10. What happens if I do nothing at all?

If you do nothing, you will keep the right to a share of any recovery that may come from a trial or settlement of the Lawsuit against the Defendants. You will not be able to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against Defendants about the legal and factual issues in this Valsartan case. All the Court's orders in the Lawsuit will apply to you and legally bind you. You will also be bound by any judgment in the Lawsuit.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the case?

Yes. The Court has appointed the following law firms to represent the Classes ("Class Counsel"). You will not be charged for their services.

Consumer Economic Loss Class Counsel

- Ruben Honik, Honik LLC
- Conlee Whiteley, Kanner & Whiteley, LLC
- John R. Davis, Slack Davis Sanger LLP

Medical Monitoring Class Counsel

- Rachel Geman, Lieff Cabraser Heimann & Bernstein
- Nicholas Migliaccio, Migliaccio & Rathod LLP

Third Party Payor Class Counsel

- Jorge Mestre, Rivero Mestre LLP
- Gregory Hansel, Preti Flaherty Beliveau & Pachios Chartered LLP

12. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel works for you, however, if you want to be represented by your own lawyer, you may hire one at your own expense and have him or her appear on your behalf in the Lawsuit.

13. How will the lawyers be paid?

This is a draft layout of the proposed website for illustrative purposes. The final website may substantially change in form and substance depending upon the final requirements dictated by the Court, Parties, Class data, Defendant data and any other specifications determined to be required by the Administrator.

If Class Counsel achieves a recovery for any of the Classes, for example by way of settlement or after winning at trial, the Court will be asked to approve reasonable attorneys' fees for, as well as reimbursement of expenses to, Class Counsel and other Court Appointed Counsel who are members of the Plaintiffs' Executive Committee and the Plaintiffs' Steering Committee in the MDL and who have advanced time and money on behalf of the Classes. If the Court grants Counsels' requests, fees and expenses would either be deducted from any money obtained for the Classes, or the Court may order the Defendants to pay attorneys' fees and costs in addition to any damage award to the Classes. Class Members will not have to pay any attorneys' fees or expenses themselves, because any fees or expenses paid will only be taken out of money obtained from Defendants, and only to the extent approved by the Court prior to their payment.

WHEN AND HOW WILL THE LAWSUIT BE RESOLVED

14. How and when will the Court decide who is right?

If the claims against Defendants are not resolved by a settlement or otherwise, Class Counsel and other Court Appointed Counsel who are members of the Plaintiffs' Executive Committee and the Plaintiffs' Steering Committee in the MDL will have to prove claims in the Consumer Economic Loss Classes, the Medical Monitoring Classes, and the Third Party Payor Classes at trial. A jury trial solely limited to certain Third Party Payor sub-classes with claims against the ZHP, Torrent and Teva entities is scheduled for [Trial Date]. There will be subsequent trial dates thereafter for the remaining claims asserted by the consumer economic loss plaintiffs, the medical monitoring class plaintiffs, and the TPP Plaintiffs. There is no guarantee that Plaintiffs will win, or that they will get any money for the Classes. Any judgment will be binding on all Class Members who have not opted out, regardless of who wins. There are no Losartan or Irbesartan claims included in the certified classes at this time. Those claims will be addressed at a later time.

15. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel and other Court Appointed Counsel who are members of the Plaintiffs' Executive Committee and the Plaintiffs' Steering Committee will present the case on your behalf, and counsel for the Defendants will present Defendants' defenses. You and/or your own lawyer may attend the trial at your own expense. If any class to which you belong obtains money or benefits as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this will take but will continue to update the website as information is received.

GETTING MORE INFORMATION

16. How do I get more information?

For more detailed information about the Lawsuit, including being able to determine whether you are a member of any of the sub-classes, [**YOU MAY SEARCH YOUR ELIGIBILITY HERE**](#)

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If you have additional questions, you may contact the Class Action Administrator by email, phone, or mail:

Email: [Email Address]

Toll-Free: 1-XXX-XXX-XXXX

Mail: Valsartan Class Action Administrator, 1650 Arch St, Ste 2210, Philadelphia, PA 19103

Publicly filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the District of New Jersey or reviewing the Court's online docket.

**PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE
FOR INFORMATION.**

Important Documents Page

If you are an individual or entity who consumed, and/or paid any amount of money for, generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ a class action lawsuit could affect your rights.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-SAK

HOME	SEARCH ELIGIBILITY	INTERACTIVE MAP AND REMEDIES	REGISTER FOR INFORMATION	FREQUENTLY ASKED QUESTIONS	IMPORTANT DOCUMENTS	CONTACT US
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IMPORTANT DOCUMENTS

Notice of Class Certification

Order on Certification of Proposed Classes under FRCP Rule 23 and on Class Certification Expert Reports under FRE 702

Master Complaints

Daubert Orders

(other documents to be determined)

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Contact Us Page

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Contact Us

Mail:

Valsartan Class Action Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

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Toll Free Phone: (xxx) xxx-xxxx

Email: Info@_____.com